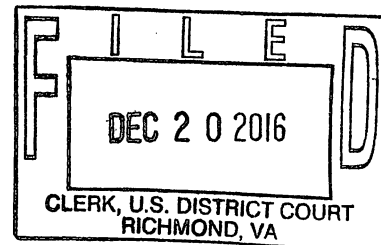


IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA	)	Criminal Action No. 3:16-cr- <u>155</u>
	)	
	)	Conspiracy to Make False Claims
v.	)	18 U.S.C. § 286
	)	(Count 1)
	)	
CRYSTAL CHARMAE RICHARDS,	)	Making False Claims
	)	18 U.S.C. §§ 287 & 2
Defendant.	)	(Counts 2-16)
	)	
	)	Theft of Government Funds
	)	18 U.S.C. §§ 641 & 2
	)	(Counts 17-19)
	)	
	)	Aggravated Identity Theft
	)	18 U.S.C. §§ 1028A(a)(1) & 2
	)	(Counts 20-22)
	)	
	)	Criminal Forfeiture Allegation
	)	18 U.S.C. §§ 981 & 982

**INDICTMENT**

December 2016 TERM - At Richmond, Virginia

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

(Conspiracy to Defraud the United States With Respect to False Claims)

Beginning prior to January 1, 2011 through on or about January 21, 2015, the exact dates being unknown to the Grand Jury, in the Eastern District of Virginia and within the jurisdiction of this Court, as well as elsewhere, defendant CRYSTAL CHARMAE RICHARDS did unlawfully and knowingly enter into an agreement, combination, and conspiracy with David

Wayne Schneider (charged in this Court under docket number 3:15-cr-201-JRS) to defraud the United States Department of Treasury by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims.

**Object of the Conspiracy**

The object of the conspiracy was for RICHARDS and Schneider to obtain funds in the possession of the United States Treasury to which they were not entitled by filing tax returns on behalf of other individuals containing false information about the other individuals' income and expenses, thereby triggering the payment of fraudulent refunds.

**Ways, Manner, and Means of the Conspiracy**

The conspiracy operated in substance as follows:

1. RICHARDS and Schneider held themselves out as tax return preparers, often promising potential clients large tax refunds.
2. RICHARDS and Schneider filed tax returns on behalf of their clients that contained materially false entries regarding income and education expenses. These false entries triggered inflated refunds that the clients would not be otherwise authorized by law to receive.
3. RICHARDS and Schneider were compensated from the fraudulently obtained refunds, and the remainder of the refunds were directed to their clients.
4. On occasion, RICHARDS kept the entirety of a client's refund generated by the filing of a false and fraudulent return, falsely reporting to the client that she had been unable to obtain a refund.
5. On other occasions, RICHARDS filed returns using the names and dates of birth of clients from previous years without their knowledge or permission, keeping the entirety of the

refund generated by the return.

(All in violation of Title 18, United States Code, Section 286.)

**COUNTS TWO THROUGH SIXTEEN**

(Making False, Fictitious, and Fraudulent Claims Against the United States)

On or about the following dates, in the Eastern District of Virginia and elsewhere, defendant CRYSTAL CHARMAE RICHARDS, aided, abetted, counseled, induced, and encouraged by David Wayne Schneider (charged in this Court under docket number 3:15-cr-201-JRS) and others, both known and unknown to the Grand Jury, did make and present to the Internal Revenue Service, part of the United States Department of Treasury the following false, fictitious, and fraudulent claims:

Count	Date	False Claim
2	1/25/2012	2011 Tax Return filed on behalf of S.T. falsely claiming a dependent and \$4,000 in education expenses, and seeking refund of \$5,494
3	1/30/2012	2011 Tax Return filed on behalf of G.J. falsely claiming \$4,000 in education expenses and \$23,715 business loss, and seeking refund of \$5,470
4	2/6/2012	2011 Tax Return filed on behalf of B.C. falsely claiming \$8,000 in education expenses and seeking refund of \$5,563
5	2/24/2012	2011 Tax Return filed on behalf of S.F. falsely claiming \$8,000 in education expenses and seeking refund of \$3,961
6	4/17/2012	2011 Tax Return filed on behalf of S.M. falsely claiming \$28,482 business loss and seeking refund of \$6,991
7	2/1/2013	2012 Tax Return filed on behalf of S.T. falsely claiming a dependent and \$8,220 business profit, and seeking refund of \$3,354
8	2/4/2013	2012 Tax Return filed on behalf of G.J. falsely claiming \$23,235 business loss and seeking refund of \$4,212

Count	Date	False Claim
9	2/27/2013	2012 Tax Return filed using name of A.M., filed without A.M.'s knowledge or permission, falsely claiming \$9,890 business profit and seeking refund of \$2,982
10	3/5/2013	2012 Tax Return filed on behalf of B.C. falsely claiming \$8,000 in education expenses and seeking refund of \$5,386
11	3/7/2013	2012 Tax Return filed using name of L.S., filed without L.S.'s knowledge or permission, falsely claiming \$4,000 in education expenses and \$9,930 business profit, and seeking refund of \$5,303
12	2/18/2014	2013 Tax Return filed on behalf of G.J. falsely claiming \$3,025 in education expenses and \$21,210 business loss, and seeking refund of \$4,757
13	2/28/2014	2013 Tax Return filed on behalf of T.D. falsely claiming dependents, \$4,000 in education expenses, and \$7,490 in business profit, and seeking refund of \$6,838
14	4/24/2014	2013 Tax Return filed on behalf of S.T. falsely claiming \$8,000 in education expenses and \$10,342 business profit, and seeking refund of \$3,789
15	2/4/2015	2014 Tax Return filed on behalf of S.R. falsely claiming \$13,560 business loss, and seeking refund of \$7,458
16	3/1/2015	2014 Tax Return filed on behalf of G.J. falsely claiming \$14,135 business loss, and seeking refund of \$2,782

(In violation of Title 18, United States Code, Sections 287 & 2.)

~~SEVENTEEN~~ ~~NINETEEN~~  
**COUNTS ~~FIFTEEN~~ THROUGH ~~SEVENTEEN~~**  
 (Theft of Government Funds)

*MBR*

On or about the following dates, in Eastern District of Virginia and elsewhere, defendant CRYSTAL CHARMAE RICHARDS, aided, abetted, counseled, and encouraged by others, both known and unknown to the Grand Jury, did knowingly and unlawfully steal and purloin monies of the United States in amounts exceeding \$1,000, that is, tax refunds paid out by the Department

of the Treasury in response to the filing of the tax returns identified below, which were filed without the knowledge and permission of the taxpayers identified below:

Count	Date	Monies of the United States
17	2/3/2012	\$3,811 paid in response to fraudulent 2011 Tax Return filed using name and personal identifying information of A.M. without A.M.'s permission
18	2/23/2012	\$2,874 paid in response to fraudulent 2011 Tax Return filed using name and personal identifying information of L.S. without L.S.'s permission
19	3/4/2013	\$4,888 paid in response to fraudulent 2012 Tax Return filed using name and personal identifying information of L.H. without L.H.'s permission

(In violation of Title 18, United States Code, Sections 641 & 2.)

**TWO**  
COUNTS TWENTY THROUGH TWENTY-FOUR  
 (Aggravated Identity Theft)

*MBR*

On or about the following dates, in the Eastern District of Virginia and within the jurisdiction of this Court, as well as elsewhere, defendant CRYSTAL CHARMAE RICHARDS, aided, abetted, counseled, induced, and encouraged by others, both known and unknown to the Grand Jury, did knowingly and unlawfully possess and use, without lawful authority, the means of identification of others, described in more detail below, during and in relation to felony violations of Title 18, United States Code, Section 641:

Count	Date	Means of Identification	Description of Transaction
20	1/26/2012	Name and social security number of A.M.	Fraudulent 2011 Tax Return filed in name of A.M.
21	2/9/2012	Name and social security number of L.S.	Fraudulent 2011 Tax Return filed in name of L.S.

Count	Date	Means of Identification	Description of Transaction
22	2/15/2013	Name and social security number of L.H.	Fraudulent 2012 Tax Return filed in name of L.H.

(In violation of Title 18, United States Code, Sections 1028A(a)(1) & 2.)

**CRIMINAL FORFEITURE ALLEGATION**

Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is notified that, if convicted of the offenses alleged in Counts Seventeen through Nineteen, she shall forfeit to the United States any property constituting, or derived from, proceeds obtained directly or indirectly as the result of such violations, including, but not limited to, any assets which may be directly forfeitable as proceeds or subject to forfeiture as a substitute asset. Property subject to forfeiture includes, but is not limited to, **a money judgment in the amount of at least \$11,573.**

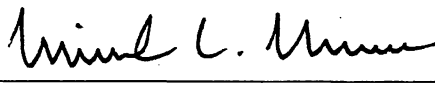
(In accordance with Title 18, United States Code, Section 981(a)(1)(C), as incorporated by 28 U.S.C. § 2461(c).)

A TRUE BILL: Pursuant to the E-Government Act,  
the original of this page has been filed  
under seal in the Clerk's Office

\_\_\_\_\_  
FOREPERSON

DANA J. BOENTE  
UNITED STATES ATTORNEY

By:

  
\_\_\_\_\_  
Michael C. Moore  
Assistant United States Attorney